

UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

LARRY DAVIS individually, and ALAN NORTHROP individually,

Plaintiffs,

V.

CLARK COUNTY, WASHINGTON, a municipal corporation; and DONALD SLAGLE,

Defendant.

NO. 3:12-cv-05765-RJB

**STIPULATED MOTION FOR ENTRY OF
JUDGMENT**

NOTING DATE: October 28, 2013

[CLERKS ACTION REQUIRED]

I. STIPULATED MOTION

COME NOW the Plaintiffs, Larry Davis and Alan Northrop, by and through their attorneys, the Connelly Law Offices, John R. Connelly, Jr., and Micah R. LeBank on behalf of Larry Davis, and McDonald Hoague & Bayless, Timothy K. Ford and David J. Whebee on behalf of Alan Northrop, the Defendants Clark County and Donald Slagle by and through their attorneys, Clark County Prosecuting Attorney's Office, and Bernard F. Valjacic and, pursuant to the CR 2A Settlement Agreement Entered into the Record in Open Court, stipulate as follows:

**STIPULATION AND ORDER FOR ENTRY OF JUDGMENT - 1
(3:12-cv-05765-RJB)**

CONNELLY LAW OFFICES
2301 North 30th Street
Tacoma, WA 98403
(253) 593-5100 Phone - (253) 593-0380 Fax

1 **IT IS HEREBY STIPULATED AND AGREED**, by and between the above parties
2 that Larry Davis shall have judgment against the Defendants Clark County and Donald Slagle,
3 jointly and severally, in the principal amount of \$17.25 million; and Alan Northrop shall have
4 judgment against the Defendants Clark County and Donald Slagle, jointly and severally, in
5 the principal amount of \$17.25 million; which amounts are for damages on account of
6 personal physical injury and physical sickness incurred by Plaintiffs as a result of certain
7 actions by the Defendants which actions are the subject of this lawsuit and which are outlined
8 in the amended complaint [Docket # 22] and the pleadings filed in this matter, depositions
9 taken, and testimony in open Court.

10 Stipulation entered this 28th day of October, 2013.
11
12

13 **CONNELLY LAW OFFICES**

14 BY /s/John R. Connelly, Jr.
15 John R. Connelly, Jr., WSBA No. 12183
jconnelly@connelly-law.com
16 Micah R. LeBank, WSBA No. 38047
mlebank@connelly-law.com
17 2130 N. 30th Street, Tacoma, WA 98403
(253) 593-5100
18 Attorneys for Plaintiff Larry Davis
19

20 **CLARK COUNTY PROSECUTING
ATTORNEY'S OFFICE**

21
22 BY /s/Bernard F. Valjacic
23 Bernard F. Valjacic, WSBA No. 28702
Bernard.veljacic@clark.wa.gov
24 Attorney for Defendants Clark County,
Washington and Donald Slagle
25 Clark County Prosecutor's Office
Civil Division
26 PO Box 5000
Vancouver, WA 98666-5000
(360) 397-2478

STIPULATION AND ORDER FOR ENTRY OF JUDGMENT - 2
(3:12-cv-05765-RJB)

MACDONALD HOAGUE & BAYLESS

BY /s/Timothy K. Ford
Timothy K. Ford, WSBA # 5986
David J. Whedbee, WSBA # 35977
timf@mhb.com; davidw@mhb.com
705 Second Avenue, Suite 1500
Seattle, WA 98104
(206) 622-1604
Attorneys for Plaintiff Alan Northrop

CONNELLY LAW OFFICES

2301 North 30th Street
Tacoma, WA 98403
(253) 593-5100 Phone - (253) 593-0380 Fax

II. ORDER

THIS MATTER, having come before the Court on the parties Stipulated Motion For
Entry of Judgment and the Court having reviewed the records and files herein, and having
been present when the CR 2A agreement was entered into the record in open court,

IT IS HEREBY ORDERED, that Plaintiff Larry Davis shall have a judgment against Defendants Clark County and Donald Slagle, jointly and severally, in the total amount of \$17,250,000.

It is further ordered that Plaintiff Alan Northrop shall have a judgment against Defendants Clark County and Donald Slagle, jointly and severally, in the total amount of \$17,250,000.

The Clerk is hereby directed to enter Judgment against Defendants Clark County and Donald Slagle in the amounts set forth above.

DATED and this 30th day of October, 2013.


ROBERT J. BRYAN
United States District Judge

**STIPULATION AND ORDER FOR ENTRY OF JUDGMENT - 3
(3:12-cv-05765-RJB)**

CONNELLY LAW OFFICES

2301 North 30th Street

Tacoma, WA 98403

(253) 593-5100 Phone - (253) 593-0380 Fax

1 Presented by:

2
3
4
CONNELLY LAW OFFICES

5 BY /s/John R. Connelly, Jr.

6 John R. Connelly, Jr., WSBA No. 12183
jconnelly@connelly-law.com
7 Micah R. LeBank, WSBA No. 38047
mlebank@connelly-law.com
8 2130 N. 30th Street, Tacoma, WA 98403
(253) 593-5100
9 Attorneys for Plaintiff Larry Davis

MACDONALD HOAGUE & BAYLESS

BY /s/Timothy K. Ford

Timothy K. Ford, WSBA # 5986
David J. Whedbee, WSBA # 35977
timf@mhb.com; davidw@mhb.com
705 Second Avenue, Suite 1500
Seattle, WA 98104
(206) 622-1604
Attorneys for Plaintiff Alan Northrop

10
11 Approved as to form:

12
13
14
**CLARK COUNTY PROSECUTING
ATTORNEY'S OFFICE**

15 BY /s/Bernard F. Valjacic

16 Bernard F. Valjacic, WSBA No. 28702
Bernard.veljacic@clark.wa.gov
17 Attorney for Defendants Clark County,
Washington and Donald Slagle
18 Clark County Prosecutor's Office
Civil Division
19 PO Box 5000
20 Vancouver, WA 98666-5000
21 (360) 397-2478

22
23
24
25
26
STIPULATION AND ORDER FOR ENTRY OF JUDGMENT - 4
(3:12-cv-05765-RJB)

CONNELLY LAW OFFICES

2301 North 30th Street
Tacoma, WA 98403
(253) 593-5100 Phone - (253) 593-0380 Fax

1
2 **CERTIFICATE OF SERVICE**
3
4

5 I, MICAH R. LEBANK, hereby certify that on the 28th Day of October, 2013, I
6 electronically filed the foregoing with the Clerk of the Court using the CM/EFC System
7 which will send notification of such filing to the following participants:
8
9

10 Bernard F. Veljacic
11 Deputy Prosecuting Attorney
12 Attorney for Defendants Clark County,
13 Washington and Donald Slagle
14 Clark County Prosecuting Attorney's Office
15 Civil Division
16 PO Box 5000
17 Vancouver, WA 98666-5000
18 Telephone: (360) 397-2478
19 E-Mail: Bernard.veljacic@clark.wa.gov

20
21 Stewart A. Estes
22 Richard B. Jolley
23 Jeremy W. Culumber
24 Keating Bucklin & McCormack, Inc., P.S.
25 800 Fifth Avenue, Suite 4141
26 Seattle, WA 98104-3175
27 Telephone: (206) 623-8861
28 E-Mail: sestes@kbmlawyers.com
29 E-Mail: rjolley@kbmlawyers.com
30 E-Mail: jculumber@kbmlawyers.com

31
32 _____
33 /s/ Micah R. LeBank
34 Micah R. LeBank, WSBA #38047
35
36

37 STIPULATION AND ORDER FOR ENTRY OF JUDGMENT - 5
38 (3:12-cv-05765-RJB)

39 10054.1 gh191401

40 **CONNELLY LAW OFFICES**

41 2301 North 30th Street
42 Tacoma, WA 98403
43 (253) 593-5100 Phone - (253) 593-0380 Fax